system to make the telephone call without termination of a current client system to

network communication session.

39.   (Newly Added) The method of claim 35, wherein said identifier comprises

a Uniform Resource Locator (URL) of said targeted network server.

40.   (Newly Added) The method of claim 1, wherein said request comprises an

identifier which identifies the targeted network server.

41.   (Newly Added) The method of claim 40, wherein said determining is

based on said identifier.

42.   (Newly Added) The method of claim 41, wherein said identifier comprises

a Uniform Resource Locator (URL) of said targeted network server.

43.   (Newly Added) The method of claim 41, said determining comprises a

step of comparing said identifier in the request with a list of identifiers kept in said

bridge server corresponding to a plurality of network servers.

REMARKS

This is responsive to the Office Action dated February 27, 2003 in the above-

identified application, in which the Examiner rejects all the pending claims. In particular,

claim 29 is rejected as being anticipated by Haserodt (US Patent No. 6,031,836) under

35USC §102(e), while other claims are rejected as being obvious over combinations of

Herz (US Patent No. 5,754,938), Van Hoff (US Patent No. 5,822,539), Haserodt (US

Patent No. 6,031,836) and Rondeau (US Patent No. 5,850,433) under 35 USC §103(a).

The applicants have made further amendment to the claims so as to more clearly and better define the invention or to perfect claim language, and respectfully traverse the rejections of the Examiner based on the amended claims as well as the following detailed explanation.

I. Brief explanation of the present invention

It is believed a brief explanation of the present invention as claimed will be helpful in understanding the patentably distinguishing features in the claims over the cited prior art.

The present invention teaches a novel technique in determining additional content other than the requested content which is requested by a client system and is to be provided by a targeted network server. In particular, the additional content is determined in a bridge server based on the request. In other words, the determination of the additional content is NOT made based upon the requested content, as is conventional in the prior art. In a preferred embodiment, the determination is made based on an identifier identifying the targeted network server, such as a URL which is typically included in the request. To more clearly define the present invention, the applicants have further amended independent claims 1 and 19 such that the determining is done "based on the request and NOT on the requested content".

Since the determination of the additional content is made based upon on the request but not the requested content, the determination of the additional content may be made in response to receiving of the request, as defined in independent claim 33, but not necessarily waiting for receipt of the requested content. The present invention, with the distinguishing features as emphasized above, results in significant differences from the

prior art where the additional content is conventionally determined <u>based on the requested content</u> and therefore the determination is made after the requested content is available. For example, with the present invention, the additional content may be determined independently of the requested content, or even when no requested content is available at the targeted network server. Furthermore, since the determination can be done in response to receiving the request but not receiving the requested content, the additional content can be determined earlier and therefore provided to the client system more quickly.

In an implementation scenario of the present invention, the request for content from the client system, which is targeting the network server, is routed to the bridge server. The bridge server determines or checks, <u>based on the request</u>, the additional content. After the determining, the bridge server returns the request back to the client system for resubmission, together with the determined additional content or an identifier of the additional content. To avoid re-determining for additional content upon receiving the re-submitted request from the client, the original request is <u>marked up by the bridge server</u> before it is returned to the client system. Thus, when the bridge server receives the re-submitted request from the client system again, the bridge server can recognize from the marking previously <u>made by the bridge server itself</u> that a determination for additional content has already been done to the request, and therefore the bridge server does not do the determining of the additional content again, but simply removes the marking and forwards the request to the targeted network server. This distinguishing feature as underlined above that the request is <u>marked by the bridge server</u> is clearly defined in independent claims 24 and 29.

II. Rejection of independent claim 24 under 35 USC §103(a)

Claim 24 is rejected as being obvious over Haserodt (US Patent No. 6,031,836) in view of Rondeau (US Patent 5,850, 433) under 25 USC §103(a). The applicants respectfully traverse this rejection. In particular, the applicants do not agree with the assertion of the Examiner that Haserodt teaches to mark up the request by the bridge server and to return the marked up request back to the client for a re-submission.

Haserodt discloses a method for a client to select server-based telephony features. In particular, a web page 115 carrying a blank feature form is downloaded from the server 104 to the client 101. Then a user of the client 103 uses a browser 113 to mark up the blank feature form (i.e., to select the desired telephony features) and uploads the marked up page 115 back to the server 104. Upon receiving of the form marked up by the client 103, the server 104 interprets the selected features and parameters, and then communicates with telephony feature server 105 or sends redirection instructions to the client 103. It can be found nowhere in Haserodt a teaching or implication that the feature form is marked up by the server 104. In fact, it is unlikely in Haserodt for the server 104 to do so since it is the user/client who shall select the desired telephony features by marking up the blank form downloaded from the server 104.

Furthermore, in Haserodt, the server 104 does not return the marked up form/page 115 back to the client, but only sends redirection instructions to the client and/or communicates with the telephony feature server 105. No teaching or implication can be found in Haserodt that the redirection instructions include the marked up form/page. In fact, there is no need or meaning for server 104 to return the marked up form/page back to the

client, since the purpose of marking up by the client is to show the server 104 what

telephony features are desired by the client.

To the contrary, It is clearly, unambiguously and repeatedly described in detail

throughout Haserodt that the feature form/page 115 (reads as "request" in claim 24) is

marked up by a user of the client 103 but NOT by the server 104 (read as "the bridge

server" in claim 24). For example, it is described in Haserodt that "the user then uses

browser 113 to mark up the feature form ... at step 208. When the user is finished, browser

113 uploads the marked up page 115 back to server 104, at step 210...(col. 3, line 67-col.

4, line 4)", "server 104 receives the marked up page 115, at step 212, ... to interpret the

marked up page 115, i.e., to determine from the feature form which features the user

selected, ...at step 214 (col. 4, lines 6 -12)", "upon receipt of the marked up page 115,

server 104 responds to the user's selection ... (col. 4, lines 45-46, col. 5, lines 1-2, lines

35-36, lines 52-53, etc.)". This is also clearly shown in Figure 2 of Haserodt patent. A blank

feature form page is downloaded from the server 104 at step 204 (at the middle column) to

the client (browser 113, at the left column), and then the step of marking up the feature

form is done by the browser 113 at step 208, then uploaded at step 210 to the server 104.

The server 104 receives marked up feature form page at 212. So, the form provided by the

server 104 to the client/browser 113 is a blank form, which will be marked up by the

browser 113, and then uploaded to the server 104 again. Server 104 does NOT mark the

form/ page, but receives a marked up form which is marked up by the client/browser.

Applicants can not locate in Haserodt the statement in the Office Action, cited by

the Examiner, that "the server 104 generates a marked up request..." (italic in the original

Office Action, on page 4, lines 13-14), which appears to be an important ground for the

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Examiner to reach his conclusions. A more specific citation from the Examiner would be highly appreciated by the applicants.

The applicants have also reviewed Rondeau (US Patent 5,850, 433) and can not find a teaching or implication the features of <u>marking up the request by the bridge server</u> and <u>returning the marked up request back to the client</u> for a re-submission, as defined in independent claim 24, either.

Therefore, claim 24, with the distinguishing features that the request is <u>marked up by the bridge server</u> and that <u>the marked up request is returned by the bridge server to the client</u> for a re-submission, is not taught either by Haserodt, Rondeau or their combination under 35USC §103(a), and is thus patentable.

III. Rejection of independent claim 29 under 35USC §102(e)

Claim 29 is rejected as being anticipated by Haserodt (US Patent No. 6,031,836) under 35 USC §102(e). The applicants have amended claim 29 to more clearly define the invention, and believe the amended claim 29 is not anticipated by Haserodt for similar reasons as those given for claim 24.

III. Rejection of dependent claims 25 and 30 under 35USC §103(a)

Claims 25 and 30 are dependent on independent claims 24 and 29 respectively, and are rejected under 35 USC §103(a) as obvious over Haserodt in view of Rondeau. Applicants respectfully traverse the rejection because, at least for the same reasons that the applicants have explained in detail with regard to independent claims 24 and 29, claims 25 and 30 are also patentable as each having included all the limitations of one of

independent claims 24 and 29.

IV. Rejection of independent claims 1, 19 and 33 under 35 USC §103(a)

Independent claims 1, 19 and 33 are rejected under 35 USC §103(a) as being obvious over Herz (US Patent No. 5,754,938) in view of Van Hoff (US Patent No. 5,822,539). The applicants respectfully traverse the rejections. In particular, the applicants do not agree with the assertion of the Examiner that Herz or Van Hoff or their combination discloses that the determination of additional content is made in the bridge server <u>based on the request and not on the requested content</u> (defined in claims 1 and 19), and/or is made <u>in response to the receiving of the request</u> (defined in claim 33). To the contrary, in both Herz and Van Hoff, the determination of additional content is made based on *the requested content* (not *the request*), and is made <u>after the requested content is available</u>, as explained in detail below.

Herz et al (US Patent No. 5,754,938) discloses a technology typically used for effectively searching for desirable objects from information servers by matching object profiles of the target objects with the search profiles (target profile interest summary) provided by the client. In Herz, a proxy server S2 is provided to stand in communication between the client C3 and the information server S4, generally for a privacy protection purpose. Basically, the client C3 sends a request to proxy server S2 for information (target object) from the information server C4. Upon verification on the client C3, the proxy server S2 forwards the request to the information server S4. In col. 39, line 64 to col. 40, line 36, Herz also teaches to provide advertisement to the client either from the proxy server S2 (read as "the bridge server") or from the information server S4 (read as "the targeted

network server").

However, Herz does not teach that the determination of the advertisement is <u>based on the request</u> or is made <u>in response to receiving of the request</u>. To the contrary, in Herz, the advertisement is determined <u>based on the target object X (requested content)</u> and is made <u>after the target object X is received</u>. As described in Herz, "if the user <u>has just retrieved a target object X, then</u> (a) either proxy server S2 ... determines a weighted set of advertisements that <u>are "associated with" target object X,</u> ... (col. 40, lines 1-5)", and "in the variation where proxy server S2 determines the set of advertisements <u>associated with target object X</u>, then this set typically consists of all advertisements ... whose target profiles are <u>within a threshold similarity distance of the target profile of target object X</u> (col. 40, lines 10-16)". Therefore, the advertisement is determined or weighted <u>based on the target object X (requested content)</u> and the determination is made <u>after the target object X is available</u>. Since the advertisement is determined based on the target object X but not the request itself, it can <u>NOT</u> be determined upon receiving of the request, and the proxy server has to wait until target object X is provided from the information server S4. This is the case in Herz where the actions 1 – 9 are listed <u>in sequence</u> (col. 38, line 53-54).

Van Hoff discloses a technique in which annotation is provided and merged by an annotation proxy server to a document requested by a client computer and received from a web server. However, Van Hoff does not teach to determine the annotation <u>based on the request and NOT on the requested document</u>, or that the annotation is determined <u>in response to receiving of the request</u>. In contrast, throughout Van Hoff, the annotation is determined <u>based on the requested document</u> (read as "requested content"), and in particular, on a character pattern found in the document (col. 5, lines 41-45). "In simplest

terms, the annotation proxy server parses the requested document and compares the characters, words, phrases, and the like with match patterns 195 in the selected annotation directory (col. 7, lines 1-5)". In fact, this comes from the very nature of annotation since an annotation to a document has to be determined based <u>on the document</u> but <u>NOT on the request</u>. In this regard, the applicants would like to emphasize that <u>the requested information</u> as noted by the Examiner in the Office Action, page 3 <u>is NOT the request</u>. Since by its nature the annotation has to be determined based on the requested document, it is simply impossible for Van Hoff to teach that the annotation be determined <u>in response to receiving of the request</u>. In fact, in Van Hoff, the request for document is even not necessarily to be received at the proxy server in some circumstance (col. 4, lines 32-35).

Therefore, the applicants believe independent claims 1, 19 and 33, with the distinguishing features absent in both Herz or Van Hoff that the additional content is determined <u>based on the request and not on the requested content</u>, and that the additional content is determined <u>in response to receiving of the request</u>, are not obvious in view of Herz or Van or their combination under 35USC §103(a) and are thus patentable.

V. Rejection on dependent claims 2-4, 11, 17-18, 21 and 34-35

Dependent claims 2-4, 11, 17-18, 21, 34 and 35 are rejected under 35 USC §103(a) as being obvious over Herz in view of Van Hoff. Applicants respectfully traverse the rejection because, at least for the same reasons that the applicants have explained in detail in regard to independent claims 1, 19 and 33, these dependent claims are also patentable as each having included all the limitations of one of three independent claims.

In particular, claims 13 and 23 further include a distinguishing feature of "marking the received request by the bridge server, and returning by the bridge server to the client system, the marked version of the received requested for re-submission by the client system" (or similar language), which can not be found in any of the cited patents, for the same reasons as explained in detail regarding to independent claim 24. Claim 15 comprises a feature that the marked version of the request is "appended with additional characters identifying the bridge server as the marking bridge server", which can not be found in any of the cited patents. Claim 35 is amended to include a feature that the additional content is determined <u>based on an identifier which is included in the request and identifies the targeted network server</u>, which can not be found in any of the cited patents. Therefore, dependent claims 13, 15, 23 and 35 are further strengthened in patentability because of these distinguishing features.

VI. Newly added dependent claims 39-43

The applicants believe, at least for the same reasons explained above regarding their respective base independent claims, these newly added dependent claims are also patentable.

In particular, claims 39, 41 and 42 further define that the additional content is "determined by the identifier included in the request" which identifies the targeted network server, or "a URL of the network server", which are not disclosed in any of the cited patents. Thus, claims 39, 41 and 42 are further strengthened in patentability for these distinguishing features.

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VII. Conclusion

Applicants believe the application is now in condition for allowance. The Examiner is respectfully requested to telephone the undersigned in order to attempt to resolve any further issues preventing the case from being passed to allowance.

The Examiner is authorized to deduct any fees believed due from our Deposit Account No. 11-0223.

Respectfully submitted,

KAPLAN & GILMAN, L.L.P.
900 Route 9 North
Woodbridge, NJ 07095
Telephone (732) 634-7634

DATED: March 21, 2003
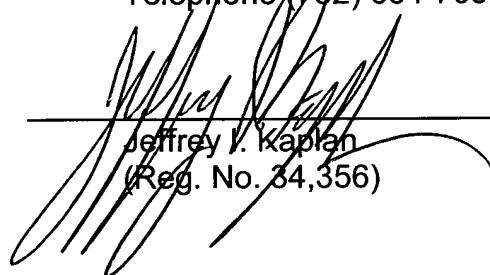
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Jeffrey I. Kaplan
(Reg. No. 34,356)

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal service as first class mail, in a postage prepaid envelope, addressed to Box Non-Fee Amendment, Commissioner for Patents, Washington, D.C. 20231 on <u>March 21, 2003</u>.

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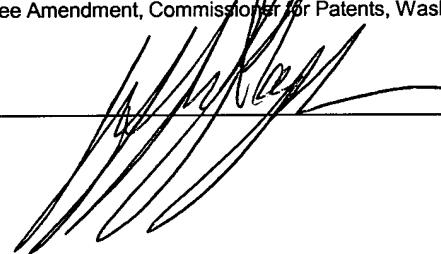
MARKED UP VERSION

OF Amended CLAIMS 1, 2, 9, 13, 19, 23, 24, 29, 30, 35, 37, 38

1. (Now Six Times Amended) In a bridge server, a method comprising:

receiving by said bridge server from a client system a request for

content targeting a network server [and not targeting said bridge server], and

determining by said bridge server, based on said received request

<u>and not on the requested content</u>, additional content other than the requested content to

be provided to the client system by the network server; and

providing by said bridge server said determined additional content

or an identifier of said additional content to said client system.

2. (Now Twice Amended) The method of claim 1 wherein said [providing

comprises providing by said bridge server,] <u>additional content comprises</u> additional

information regarding said network server to said client system.

9. (Now Twice Amended) The method of claim 1, wherein the method further

comprises automatically establishing and facilitating a voice call to a PSTN handset [by the

network server] in response to a user of the client system selecting the additional content.

13. (Now Twice Amended) The method of claim 1, further comprising <u>marking the</u>

<u>received request by the bridge server, and</u> returning by the bridge server to the client

system, [a] <u>the</u> marked version of the received requested for re-submission by the client

system.

19. (Now Five Times Amended) A bridge server comprising:

control logic operative to receive a request for content from a client system

targeting a network server, and to check, based on said received request <u>and not on the</u> <u>requested content</u>, whether additional content is to be provided to the client system, in addition to the requested content to be provided to the client system by the network server; and

content-adding logic, coupled to the control logic, operative to provide the additional content or an identifier of said additional content to the client system if the additional content is to be provided.

23.   (Now Twice Amended) The bridge server of claim 19, wherein the control logic is further operative to mark up the request, return the marked up request to the client system for re-submission, and upon [re-receive] <u>re-receiving</u> of the marked up request, remove the marking, then forward the request to the targeted network server.

24.   (Now Thrice Amended) In a bridge server, a method comprising:

receiving by the bridge server a request for content from a client system targeting a network server; and

marking up by the bridge server the received request and returning the marked up request to the client system for re-submission [the marking up being performed in a manner that specified the additional content to be provided].

29.   (Now Four Times Amended) A client system comprising:

means for transmitting a request that targets a network server; [and]

means for [re-transmitting the request in a marked up form, upon] receiving return of the request, from a bridge server, in [said marked up] <u>a</u> form marked up by said bridge server<u>; and</u>

<u>means for re-transmitting the request in said marked up form</u>.

30.   (Now Thrice Amended) The client system of claim 29, further comprising:

means for transmitting another request for additional content, upon

receipt of an identifier of the additional content from [a] said bridge server provided in

response to the first transmission of the request.

35.   (Previously Added and Now Once Amended) The method of claim [34, further

comprising a step of providing said requested content to said client system] 33, wherein

said determining is based on an identifier which is included in said request and identifies

the targeted network server.

37.   (Previously Added and Now Once Amended) The method of claim 36

wherein said [additional content comprises an] option for making a telephone call is an

option allowing a user of the client system to make the telephone call without requiring

provision of a telephone number by a user.

38.   (Previously Added and Now Once Amended) The method of claim 36

wherein said [additional content comprises an] option for making a telephone call is an

option allowing a user of the client system to make the telephone call without

termination of a current client system to network communication session.